Dennis Raybould P.O. Box 241 Florence, OR 97439 (541) 997-1311

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON EUGENE DIVISION

Dennis Raybould, Diane Raybould,	Case No. 6:19-cv-01364-AA
Plaintiffs,	
vs. RUSHMORE LOAN MANAGEMENT SERVICES, LLC, et al,	MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO 1241 MOTION TO DISMISS
Defendants.	[24] MOTION TO DIS

CERTIFICATION

I, the undersigned Plaintiff, certify that I have conferred with Defendant, and have been informed that they will oppose this motion.

NOTE

As a threshold matter, this Court does not have jurisdiction of the case because it is on appeal at the Ninth Circuit as 19-35842. On 11/4/2019, Plaintiff moved to stay the mandate; that motion is still pending.

MOTION

Dennis Raybould, Plaintiff in the above named action move for an enlargement of time to respond to [24] Motion to Dismiss, filed by Defendant Rushmore Loan Services, LLC.

Response is currently due 12/3/2019. Plaintiff requests 30 days, or until January 2, 2020; or until 14 days after such time as the case is remanded from the Ninth Circuit.

This is the first motion for enlargement of time.

The legal issues involved are complex, especially for a pro se litigant, and require research.

Plaintiff has been diligent and yet still requires more time. This motion is not intended for delay.

Executed on: November 27, 2019

By:

Dennis Raybould, Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the date last written below, a true and correct copy of this document was furnished via facsimile and/or U.S. mail and/or email to:

JPMorgan Chase Bank, N.A. c/o KEVIN H. KONO, OSB #023528 c/o ASHLEE AGUIAR, OSB #171940 Davis Wright Tremaine LLP 1300 S.W. Fifth Avenue, Suite 2400 Portland, Oregon 97201-5610

JPMorgan Chase Bank, N.A. c/o FREDERICK B. BURNSIDE, OSB #096617 920 Fifth Avenue, Suite 3300 Seattle, Washington 98104-1610

Rushmore Loan Management Services, LLC. c/o STANTON SHELBY, OSB #044151 ALDRIDGE PITE LLP 121 SW Columbia Ave. Suite 950 Portland OR 97201

US Bank N.A. Not in its Individual Capacity but Solely as Trustee for the RMAC Trust, Series 2016-CTT, whose address is 60 Livingston Avenue, St. Paul MN 55107-2292 c/o STANTON SHELBY, OSB #044151 ALDRIDGE PITE LLP 121 SW Columbia Ave. Suite 950 Portland OR 97201

DATED: November 27, 2019

Dennis Raybould